

**MANNING CURTIS BRADSHAW
& BEDNAR PLLC**

Alan C. Bradshaw #4801
Matthew D. Church #15574
Carson M. Fuller #17571
201 South Main Street, Suite 750
Salt Lake City, UT 84111
Telephone: (801) 363-5678
Facsimile: (801) 364-5678
abradshaw@mc2b.com
mchurch@mc2b.com
cfuller@mc2b.com

Attorneys for Plaintiff Geneva Rock Products, Inc.

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

GENEVA ROCK PRODUCTS, INC.,

Plaintiff,

v.

QBE INSURANCE CORPORATION,

Defendant.

**APPENDIX OF EVIDENCE IN
SUPPORT OF GENEVA ROCK
PRODUCTS, INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Civil No. 2:23-cv-00424-DAK-DAO

Judge: Dale A. Kimball

Magistrate Judge: Daphne A. Oberg

Plaintiff Geneva Rock Products, Inc. (“Geneva”), through counsel, and in accordance with DUCivR 56-1, submits this Appendix of Evidence to its Motion for Partial Summary Judgment.

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Exhibit No.	Description	Source
A.	Policy No. QPL0057435 issued by QBE Insurance Corporation (“QBE”) to Clyde Companies, Inc. for policy period August 21, 2017 to August 21, 2018.	QBE000407-443 (Defendant’s Production)

B.	Policy No. 003751800 issued by Ironshore Indemnity Inc. (“Ironshore”) to Clyde Companies, Inc. for policy period August 21, 2018 – August 21, 2019.	GENEVA001546-1597 (Plaintiff’s Production)
C.	Raul Guzman’s (“Guzman”) Charge of Discrimination filed with the Equal Employment Opportunity Commission and the Utah Anti-Discrimination & Labor Division of the Utah Labor Commission December 15, 2017.	GENEVA000062-69 (Plaintiff’s Production)
D.	QBE Insurance Corporation’s Response to Plaintiff’s First Set of Written Discovery Requests dated December 15, 2023.	
E.	Oghenetega Emuveyan’s (“Emuveyan”) Charge of Discrimination filed with the Utah Anti-Discrimination & Labor Division of the Utah Labor Commission January 3, 2018.	GENEVA000053-60 (Plaintiff’s Production)
F.	Emuveyan Demand Letter to Geneva Rock Products, Inc. (“Geneva”) dated June 21, 2018 (FILED UNDER SEAL)	GENEVA000491-497 Confidential (Plaintiff’s Production)
G.	Dismissal and Notice of Rights letters issued by he Utah Labor Commission related to Guzman (February 7, 2019) and Emuvyan’s (March 19, 2019) Charge.	GENEVA000430, 2678 (Plaintiff’s Production)
H.	Beehive Insurance Agency Agreement with QBE, QBE’s parent and QBE’s affiliated companies. (FILED UNDER SEAL)	BEE001664-1689 Confidential (Plaintiff’s Production)
I.	Deposition transcript of QBE 30(b)(6) designee Jonathan Fanti dated August 8, 2024.	
J.	Ironshore coverage position letter to Geneva dated June 21, 2021.	GENEVA000603-605 (Plaintiff’s Production)
K.	Beehive Insurance emails to QBE providing notice of Emuveyan and Guzman claims dated April 21, 2021.	BEE000865-876, 891-924 (Plaintiff’s Production)
L.	Notices of the Guzman claim provided to Beehive Insurance in emails dated December 14, 2017 and June 15, 2018,	BEE000011-12, 23-37, 98 (Plaintiff’s Production)
M.	Notices of the Guzman claim provided to Beehive Insurance in emails dated December 27, 2017 and August 16, 2018. (FILED UNDER SEAL)	BEE000016-17, 98 (Plaintiff’s Production)

N.	QBE letters to Clyde Companies, Inc. dated May 19, 2021.	GENEVA000038-43 (Plaintiff's Production)
O.	June 2, 2021 through June 4, 2021 communications with QBE.	QBE000020-38, 444-460, 18-19, 12-17 GENEVA000080-84 (Defendant and Plaintiff Productions)
P.	Deposition transcript of Gabe Speciale dated July 2, 2024	
Q.	QBE policy forms	GENEVA001654-1770 (Plaintiff's Production)
R.	Deposition transcript of QBE 30(b)(6) designee Megan Scully dated July 23, 2024	
S.	Deposition transcript of Eden Stark dated July 11, 2024	
T.	Deposition transcript of Cory Wennmacher dated July 12, 2024	
U.	Deposition transcript of Geneva 30(b)(6) designee Brandon Hale dated August 22, 2024	
V.	Guzman Settlement (FILED UNDER SEAL)	SCM000424-435, 407 Confidential (Plaintiff's Production)
W.	Snow Christensen Invoices (FILED UNDER SEAL)	SCM001725-1728 Confidential (Plaintiff's Production)
X.	Emuveyan Judgment	GENEVA001827-1828 (Plaintiff's Production)
Y.	Parsons Behle Invoices (FILED UNDER SEAL)	PBL001061-1314, 1527-1613, 705-1060, 1330-1526 Confidential (Plaintiff's Production)
Z.	QBE letter to Clyde Companies, Inc. dated June 24, 2021	GENEVA000098-102 (Plaintiff's Production)

DATED this 23rd day of January, 2025.

**MANNING CURTIS BRADSHAW
& BEDNAR PLLC**

/s/ Alan C. Bradshaw

Alan C. Bradshaw

Matthew D. Church

Carson M. Fuller

Attorneys for Plaintiff Geneva Rock Products, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of January, 2025, I served true and correct copies of the foregoing upon the following counsel of record, in the manner indicated below:

<input type="checkbox"/> Hand Delivery	Andrew L. Margulis
<input type="checkbox"/> U.S. Mail	Tehila N. Colman
<input type="checkbox"/> Overnight Mail	ROPERS MAJESKI PC
<input type="checkbox"/> Fax Transmission	800 Third Avenue, 29th Floor
<input type="checkbox"/> E-Mail Transmission	New York, NY 10022
<input checked="" type="checkbox"/> Electronic Filing	andrew.margulis@ropers.com
	tehila.colman@ropers.com

Heidi G. Goebel (10343)
GOEBEL ANDERSON PC
405 South Main Street, Suite 200
Salt Lake City, UT 84111
hgoebel@GAPClaw.com

*Attorneys for Defendant QBE Insurance
Corporation*

/s/ DiAnn Calacino